

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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In re	: Chapter 9
	:
CITY OF DETROIT, MICHIGAN,	: Case No. 13-53846
	:
Debtor.	: Hon. Steven W. Rhodes
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	:
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**CITY OF DETROIT’S STATEMENT REGARDING THE
PUBLIC SAFETY UNIONS’ DESIGNATION OF THE CONTENTS
OF THE RECORD AND STATEMENT OF ISSUES ON APPEAL**

The City of Detroit (“City”) is the Debtor in this chapter 9 case and appellee with respect to the *Notice of Appeal* filed by the Detroit Fire Fighters Association, the Detroit Police Officers Association, and the Detroit Police Command Officers Association (collectively, the “Public Safety Unions”) [Docket Nos. 2137 and 2253] to challenge the Court’s *Opinion Regarding Eligibility* [Docket No. 1945] and *Order for Relief Under Chapter 9 of the Bankruptcy Code* [Docket No. 1946]. The City states that it filed its counter-designation of the record and counter-statement of the issues pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure in response to the *Appellants’ Designation of Items to be Included in the Record on Appeal* [Docket No. 2335] and the *Appellants’ Statement of Issues to be*

Presented on Appeal [Docket No. 2336] on January 2, 2014, at Docket No. 2361,
which is incorporated herein by reference.

Dated: January 10, 2014

Respectfully submitted,

/s/ David G. Heiman

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ATTORNEYS FOR THE CITY

Certificate of Service

I, David G. Heiman, hereby certify that the foregoing **CITY OF DETROIT'S STATEMENT REGARDING THE PUBLIC SAFETY UNIONS' DESIGNATION OF THE CONTENTS OF THE RECORD AND STATEMENT OF ISSUES ON APPEAL** was filed and served via the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this manner on this 10th day of January 2014.

/s/ David G. Heiman_____

David G. Heiman